



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2466

JUL 24 1996

Ref: 8ENF-T

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Arthur F. Clark, Ph.D.  
Technical Director  
AET Environmental  
4661 Monaco Street  
Denver, CO 80216

Re: UNDERGROUND INJECTION CONTROL (UIC)  
Approval of Injection Fluid  
Suckla Farms No.1 Class I Well  
EPA Permit No. CO1516-02115  
Weld County, CO

Dear Mr. Clark:

Based on the data submitted by AET Environmental pertaining to the nickel and ethylenediamine tetraacetic acid (EDTA) containing solutions from Kapp Tech, 2870 Wilderness Place, Boulder, Colorado, it has been determined by the U.S. Environmental Protection Agency that the fluid is classified as a nonhazardous waste. Therefore, the fluid (estimated volume 5,000 gallons/month) from Kapp Tech is approved for delivery and injection into the Suckla Farms No.1 disposal well.

If you have any questions concerning this letter, you may contact John Carson at (303) 312-6203. Also, please direct all correspondence to the attention of John Carson at Mail Code 8ENF-T.

Sincerely,

Sharon L. Kercher, Director  
Technical Enforcement Program

cc: Martin J. Wohnlich  
Wright's Disposal, Inc.  
2323 South Wadsworth, Suite 107  
Denver, CO 80227



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2466

SEP 25 1996

Ref: 8ENF-T

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Arthur F. Clark, Ph.D.  
Technical Director  
AET Environmental  
4661 Monaco Street  
Denver, CO 80216

Re: UNDERGROUND INJECTION CONTROL (UIC)  
Approval of Injection Fluid  
Suckla Farms No.1 Class I Well  
EPA Permit No. CO1516-02115  
Weld County, CO

Dear Mr. Clark:

Based on the data submitted by AET Environmental pertaining to the detergent metal cleaning bath solution from Electronics Metal Products, 21000 East 32nd Parkway, Aurora, Colorado, it has been determined by the U.S. Environmental Protection Agency that the fluid is classified as a nonhazardous waste. Therefore, the fluid (estimated volume 2,800 gallons) from Electronics Metal Products is approved for delivery and injection into the Suckla Farms No.1 disposal well.

If you have any questions concerning this letter, you may contact John Carson at (303) 312-6203. Also, please direct all correspondence to the attention of John Carson at Mail Code 8ENF-T.

Sincerely,

Sharon L. Kercher, Director  
Technical Enforcement Program

cc: Martin J. Wohnlich  
Wright's Disposal, Inc.  
2323 South Wadsworth, Suite 107  
Denver, CO 80227

Ken Mersfelder  
Wright's Disposal, Inc.  
P.O. Box 245  
Fort Lupton, CO 80621



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SEP 25 1996

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Arthur F. Clark, Ph.D.  
Technical Director  
AET Environmental  
4661 Monaco Street  
Denver, CO 80216

Re: UNDERGROUND INJECTION CONTROL (UIC)  
Approval of Injection Fluid  
Suckla Farms No.1 Class I Well  
EPA Permit No. CO1516-02115  
Weld County, CO

Dear Mr. Clark:

Based on the data submitted by AET Environmental pertaining to the detergent metal cleaning bath solution from Electronics Metal Products, 21000 East 32nd Parkway, Aurora, Colorado, it has been determined by the U.S. Environmental Protection Agency that the fluid is classified as a nonhazardous waste. Therefore, the fluid (estimated volume 2,800 gallons) from Electronics Metal Products is approved for delivery and injection into the Suckla Farms No.1 disposal well.

If you have any questions concerning this letter, you may contact John Carson at (303) 312-6203. Also, please direct all correspondence to the attention of John Carson at Mail Code 8ENF-T.

Sincerely,

Sharon L. Kercher, Director  
Technical Enforcement Program

cc: Martin J. Wohnlich  
Wright's Disposal, Inc.  
2323 South Wadsworth, Suite 107  
Denver, CO 80227

Ken Mersfelder  
Wright's Disposal, Inc.  
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SEP 25 1996

Ref: 8ENF-T

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Tom White  
True Green Environmental Solutions, Inc.  
5085 Oakland Street  
Denver, CO 80239

Re: UNDERGROUND INJECTION CONTROL (UIC)  
Approval of Injection Fluid  
Suckla Farms No.1 Class I Well  
EPA Permit No. CO1516-02115  
Weld County, CO

Dear Mr. White:

Based on the data submitted by True Green pertaining to the waste water generated as part of the laboratory sample preparation process by Pace Incorporated in Golden, Colorado, it has been determined by the U.S. Environmental Protection Agency that the fluid is classified as a nonhazardous waste. Therefore, the fluid (estimated volume 5,000 to 7,000 gallons) from Pace International is approved for delivery and injection into the Suckla Farms No.1 disposal well.

If you have any questions concerning this letter, you may contact John Carson at (303) 312-6203. Also, please direct all correspondence to the attention of John Carson at Mail Code 8ENF-T.

Sincerely,

Sharon L. Kercher, Director  
Technical Enforcement Program

cc: Martin J. Wohnlich  
Wright's Disposal, Inc.  
2323 South Wadsworth, Suite 107  
Denver, CO 80227

Ken Mersfelder  
Wright's Disposal, Inc.  
P.O. Box 245  
Fort Lupton, CO 80621



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DENVER, COLORADO 80202-2466

Ref: 8ENF-T

SEP 27 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Malcolm C. Miller  
Facilities Manager  
AFT Advanced Forming Technology  
2150 Miller Drive  
Longmont, CO 80501-6744

Re: UNDERGROUND INJECTION CONTROL (UIC)  
Approval of Injection Fluid  
Suckla Farms No.1 Class I Well  
EPA Permit No. CO1516-02115  
Weld County, CO

Dear Mr. Miller:

Based on the MSDS data submitted by Advanced Forming Technology pertaining to the industrial cleaning solution manufactured by Mohawk Lab Div., NCH Corp., Erving, Texas, it has been determined by the U.S. Environmental Protection Agency that the fluid is classified as a nonhazardous waste. Therefore, the fluid (estimated volume 3,400 gallons) is approved for delivery and injection into the Suckla Farms No.1 disposal well. The cleaning solution is to be used in a one time application to flush an industrial cooling system which is now under construction.

If you have any questions concerning this letter, you may contact John Carson at (303) 312-6203. Also, please direct all correspondence to the attention of John Carson at Mail Code 8ENF-T.

Sincerely,

Sharon L. Kercher, Director  
Technical Enforcement Program

cc: Martin J. Wohnlich  
Wright's Disposal, Inc.  
2323 South Wadsworth, Suite 107  
Denver, CO 80227

Ken Mersfelder  
Wright's Disposal, Inc.  
P.O. Box 245  
Fort Lupton, CO 80621



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Ref: 8ENF-T

NOV 14 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Arthur F. Clark, Ph.D.  
Technical Director  
AET Environmental  
4661 Monaco Street  
Denver, CO 80216

Re: UNDERGROUND INJECTION CONTROL (UIC)  
Approval of Injection Fluid  
Suckla Farms No.1 Class I Well  
EPA Permit No. CO1516-02115  
Weld County, CO

Dear Mr. Clark:

Based on the data submitted by AET Environmental pertaining to the detergent metal cleaning bath solution from Electronics Metal Products, 21000 East 32nd Parkway, Aurora, Colorado, it has been determined by the U.S. Environmental Protection Agency that the fluid is classified as a nonhazardous waste. Therefore, the fluid (estimated volume 6,400 gallons) from Electronics Metal Products is approved for delivery and injection into the Suckla Farms No.1 disposal well. A previous shipment of this same fluid waste was approved for injection on September 25, 1996.

If you have any questions concerning this letter, you may contact John Carson at (303) 312-6203. Also, please direct all correspondence to the attention of John Carson at Mail Code 8ENF-T.

Sincerely,

Sharon L. Kercher, Director  
Technical Enforcement Program

cc: Martin J. Wohnlich  
Wright's Disposal, Inc.  
2323 South Wadsworth, Suite 107  
Denver, CO 80227

Ken Mersfelder  
Wright's Disposal, Inc.  
P.O. Box 245  
Fort Lupton, CO 80621



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DENVER, COLORADO 80202-2466

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NOV 9 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Arthur F. Clark, Ph.D.  
Technical Director  
AET Environmental  
4661 Monaco Street  
Denver, CO 80216

Re: UNDERGROUND INJECTION CONTROL (UIC)  
Approval of Injection Fluid  
Suckla Farms No.1 Class I Well  
EPA Permit No. CO1516-02115  
Weld County, CO

Dear Mr. Clark:

Based on the data submitted to water from a passive solar determined by the U.S. Environment fluid is classified as a nonh is from a solar heating system Baughman, 725 York Street, Den approved for delivery and inj disposal well; estimated volum 2585 gallons.

If you have any question contact John Carson at (303) 3 correspondence to the attentio 8ENF-T.

cc: Martin J. Wohnlich  
Wright's Disposal, Inc.  
2323 South Wadsworth, Sui  
Denver, CO 80227

Ken Mersfelder  
Wright's Disposal, Inc.  
P.O. Box 245  
Fort Lupton, CO 80621

Thank you for using Return Receipt Service.

PS Form 3811, December 1991

U.S. E.P.A. Form 352-714

DOMESTIC RETURN RECEIPT

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services (for an extra fee):
- Complete items 3, 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

1. ☐ Addressee's Address

2. ☐ Restricted Delivery

Consult postmaster for fee.

4a. Article Number P 291 996 991

4b. Service Type

- ☐ Registered
- ☒ Certified
- ☐ Insured
- ☐ COD
- ☐ Express Mail
- ☐ Return Receipt for Merchandise

7. Date of Delivery

8. Addressee's Address (Only if requested and fee is paid)

5. Signature (Addressee)

6. Signature (Agent)

ARTHUR F. CLARK, PH.D.  
TECHNICAL DIRECTOR  
A&T ENVIRONMENTAL  
4661 MONACO STREET  
DENVER, CO 80216



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2466

NOV 26 1996

Ref: 8ENF-T

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Arthur F. Clark, Ph.D.  
Technical Director  
AET Environmental  
4661 Monaco Street  
Denver, CO 80216

Re: UNDERGROUND INJECTION CONTROL (UIC)  
Approval of Injection Fluid  
Suckla Farms No.1 Class I Well  
EPA Permit No. CO1516-02115  
Weld County, CO

Dear Mr. Clark:

Based on the data submitted by AET Environmental pertaining to water used to heat treat steel, it has been determined by the U.S. Environmental Protection Agency that the fluid is classified as a nonhazardous waste. Source of the water is from a tank at H&H Tooling, 430 South Navajo Street, Denver, Colorado 80223. This water is approved for delivery and injection into the Suckla Farms No.1 disposal well; estimated volume of water to be disposed of is 500 gallons.

If you have any questions concerning this letter, you may contact John Carson at (303) 312-6203. Also, please direct all correspondence to the attention of John Carson at Mail Code 8ENF-T.

Sincerely,

Sharon L. Kercher, Director  
Technical Enforcement Program

cc: Martin J. Wohnlich  
Wright's Disposal, Inc.  
2323 South Wadsworth, Suite 107  
Denver, CO 80227

Ken Mersfelder  
Wright's Disposal, Inc.  
P.O. Box 245  
Fort Lupton, CO 80621



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Ref: 8ENF-T

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Tom White  
True Green Environmental Solutions, Inc.  
5085 Oakland Street  
Denver, CO 80239

Re: UNDERGROUND INJECTION CONTROL (UIC)  
Disapproval of Injection Fluid  
Suckla Farms No.1 Class I Well  
EPA Permit No. CO1516-02115  
Weld County, CO

Dear Mr. White:

As a revision of our letter of September 25, 1996, regarding the disposal of waste water in the Suckla Farms No.1 well in Weld County, please be advised of the following: subsequent to our initial approval for injection of waste water generated as part of the laboratory sample preparation process by Pace Incorporated in Golden, Colorado, consultation with the Colorado Department of Health revealed that the waste does contain hazardous material, and therefore, is not approved for delivery and injection into the Suckla Farms No.1 disposal well.

Estimated volume of waste water that was proposed for injection was 5,000 to 7,000 gallons. The primary reason for classifying the waste water as hazardous is due to its containing methylene chloride, a solvent which is a listed F-002 hazardous waste.

If you have any questions concerning this letter, you may contact John Carson at (303) 312-6203. Also, please direct all correspondence to the attention of John Carson at Mail Code 8ENF-T.

Sincerely,

A handwritten signature in cursive script that reads "Sharon L. Kercher".

Sharon L. Kercher, Director  
Technical Enforcement Program



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RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE	
		<input type="checkbox"/> OTHER (SPECIFY) _____ (Record of item checked above)	
TO: J. Carson	FROM: Jeff Dike Eltex Environmental Services	DATE: 10/17/96	
		TIME: 10:15	
SUBJECT: Fluids for Suckla Fms #1		238-8710	
SUMMARY OF COMMUNICATION Jeff Dike will send in analysis of 13,000 gal waste water: 99% water, 1% paint. No solvents.			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
INFORMATION COPIES TO:			

RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
		(Record of item checked above)	
TO: J. Carson	FROM: Ken Menfelder	DATE: 10/4/96	
		TIME: 1:00	
SUBJECT: Wright's Sockla Fms. #1			
SUMMARY OF COMMUNICATION <p>Ken called about True Green fluids. State said had high Methlene Chloride which was radioactive.</p> <p>Ken wanted letter reminding my letter of approval. Told him state man had called me and was going to write letter prohibiting injection.</p> <p>Told Ken I would write him letter when I got the letter from state.</p> <p>Ken said the two True Green men had started their own outfit. Had worked for CCI and got crosswise.</p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
INFORMATION COPIES TO:			



<b>RECORD OF COMMUNICATION</b>		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
		(Record of item checked above)	
TO:	Tom White True Green Environmental	FROM:	J. Carson
			DATE: 9/19/96
			TIME: 2:10
SUBJECT: 574-9188			
<b>SUMMARY OF COMMUNICATION</b> <p>Called Tom to discuss analysis he had FAX'd in 9/17/96.</p> <p>He will send letter stating fluid is nonhazardous.</p> <p>Total Recoverable Metals (3rd page) has high concentration in the <u>sludge</u> for Arsenic, Chromium, lead, Mercury.</p> <p>Reporting limit column: means that lab can't detect metals less than these limits.</p> <p>The <u>TCLP Metals</u> has Concentration mg/L all below the Regulatory levels.</p> <p>One-time disposal of 5000-7000 gal. waste water generated by sample preparation process to Extract water.</p> <p>Pace Incorporated in Golden, CO</p>			
<b>CONCLUSIONS, ACTION TAKEN OR REQUIRED</b> <p>Acetone F003 ; U002</p> <p>Methylene Chloride F001 ; U080</p> <p>F002</p>			
<b>INFORMATION COPIES</b> TO:			

RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
		(Record of item checked above)	
TO: Malcolm Miller Advanced Forming Tech		FROM: J. Carson	DATE 9/18/96 TIME 1:00
SUBJECT Longmont, CO (303) 651-6557 - Wright's Suckla Fms. #1			
SUMMARY OF COMMUNICATION (CO1516-02115) Returned call to Malcolm Miller. He will send letter in. regarding cleaning fluid used to flush cooling tower - non hazardous.			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
INFORMATION COPIES TO:			

RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
		(Record of item checked above)	
TO:	D. Carson	FROM:	Ken Merstfelder
		DATE	8/22/96
		TIME	2:00
SUBJECT Wright's Sockla Fms #1 (CO1376-00115)			
SUMMARY OF COMMUNICATION <p>Ken called: Said after recent WO &amp; MIT, the annulus pressure builds up to 150" (<math>\pm</math>) when well is shut-in due to down hole heat. When injecting annulus press. drops to 75" (<math>\pm</math>) due to colder water going down tubing. He will be able to monitor the well better this way for potential loss of MI.</p> <p>Quarterly reports will be sent in soon.</p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
INFORMATION COPIES TO:			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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DENVER, COLORADO 80202-2466

AUG - 9 1996

Ref: 8ENF-T

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Martin J. Wohnlich  
Wright,s Disposal, Inc.  
2323 S. Wadsworth Blvd., Suite 107  
Denver, CO 80227

Re: UNDERGROUND INJECTION CONTROL (UIC)  
Notice of Noncompliance  
Suckla Farms #1 Class I Well  
EPA Permit No. CO1516-02115  
Weld County, CO

Dear Mr. Wohnlich:

The Suckla Farms #1 injection well failed to pass a mechanical integrity test on August 7, 1996; therefore, the well must remain shut-in until the necessary workover operation is performed. This well is required to demonstrate mechanical integrity every two years in order to comply with UIC regulations for Class I wells.

Following the workover operation, the well must pass a mechanical integrity test before injection operations can resume. In addition, the enclosed Well Rework Record (EPA Form 7520-12) is to be submitted to this office within thirty (30) days of receipt of this letter.

If you have any questions concerning this letter, you may contact John Carson at (303) 312-6203. Also, please direct all correspondence to the attention of John Carson at Mail Code 8ENF-T.

Sincerely,

Sharon L. Kercher, Director  
Technical Enforcement Program

Enclosures: Mechanical Integrity Test Form  
Well Rework Record (EPA Form 7520-12)

cc: Mr. Ken Mersfelder  
Wright's Disposal, Inc.  
P.O. Box 245  
Fort Lupton, CO 80621



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RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
		(Record of item checked above)	
TO:	J. Carson	FROM:	Ken Mensfelder Wrights.
		DATE	7/23/96
		TIME	8:20
SUBJECT Suckla Fms #1			
SUMMARY OF COMMUNICATION Want to start injecting Montfort brine soon. Montfort not clear on what the approval entails. check the letter from us in 1993. John w/Montfort (970) 356-0765 Ken will call Environmental man with Montfort to contact me.			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
INFORMATION COPIES TO:			

RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSS. <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE	
		<input type="checkbox"/> OTHER (SPECIFY) :	
		(Record of item checked above)	
TO:	Ken Mersfelder (303) 489-5053 (mobile)	FROM:	J. Conson
		DATE	7/10/96
		TIME	10:30
SUBJECT Wright's Sockla Fms #1			
SUMMARY OF COMMUNICATION <p>Returned call to Ken.          He just wanted to report that that the          fluid approved from AFB in Cheyenne          has started to be delivered for injection.          Was approved last December.</p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
INFORMATION COPIES TO:			

# RECORD OF COMMUNICATION

☒ PHONE CALL

☐ DISCUSSION

☐ FIELD TRIP

☐ CONFERENCE

☐ OTHER (SPECIFY)

(RECORD OF ITEM CIRCLED ABOVE)

TO: Clayton Miller

FROM:

J. Carson

DATE

4/4/96

Gerrity Oil & Gas 939-8585

TIME

2:30

SUBJECT:

Questions about a Class I well.

SUMMARY OF COMMUNICATION

Returned call to Clayton Miller. He is out of office and not in till Monday.

4/8/96 Clayton called: Gerrity may buy Wright's Sukla Farm #1 well. Clayton trying to find what sort of generators can be lined up as suppliers. Gave him Felix Flechas number for more info. on what EPA may have, etc.

I mailed Clayton the Hazardous Vs Nonhazardous write-up.

Clayton Miller  
Gerrity Oil & Gas  
804 Grand Avenue  
Platteville, CO 80651

CONCLUSIONS, ACTION TAKEN OR REQUIRED

INFORMATION COPIES

TO:

4/23/96

Ron Johnson      Felix  
Clayton Miller      Paul

Industrial Landfill in Adams County - CSI  
Liquid waste taken there and converted to solid to dispose of.

Snyder & Jassett to be merged with Gerrity.  
New company will be Patina. No more Gerrity company.



**Ron Johnson**

Tel.: (303) 986-6440  
Fax: (303) 988-8202

4220 Allison Street  
Lakewood, Co. 80235

G E R R I T Y  
O I L & G A S  
C O R P O R A T I O N

Clayton L. Miller, P.E.  
*Production Manager*

4100 East Mississippi Avenue  
Suite 1200  
Denver, Colorado 80222  
Fax 303 757.1197  
Telephone 303 757.1110